

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22626

ROCKY RAFAEL FERNANDEZ NAVARRO,

Plaintiff,

vs.

SELENIS TECHNOLOGIES LLC,
et al.

Defendants.

**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Come Now Defendant, SELENIS TECHNOLOGIES, by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure Rule 6(b)(1)(a) and Local Rule 7.1, and hereby files Defendant’s Unopposed Motion for Extension of Time to Answer the Complaint and in support thereof state as follows:

1. Plaintiff filed his Complaint on August 18, 2022. [DE 1].
2. Plaintiff filed an amended complaint on December 5, 2022. [DE 16].
3. From the record it appears that Plaintiff has attempted to serve the Defendants but contend they were unable to do so. Plaintiff sought to serve the Corporate Defendant, Selenis Technologies (“Selenis”) via substituted service through the Secretary of State. [DE 22, 23]. On February 17, 2023, Plaintiff provided notice to the Court of substituted service to the Secretary of State only as to Defendant Selenis. [DE 25].
4. On March 2, 2023, the Court dismissed the claims against Defendants Valerio Cerron and Uwe Cerron. [DE 26].

5. Undersigned counsel was retained to represent Selenis in this matter on Friday, March 3, 2023.

6. Undersigned counsel was at the time on a cruise and had limited internet access. Undersigned counsel returned to South Florida on March 5, 2023, the date of this filing.

7. Additionally, the representative of Selenis is out of town which has further limited undersigned's ability to verify the allegations set forth by Plaintiff.

8. Due to undersigned's vacation and the representative of Selenis being out of town, the undersigned requests a brief extension of time to adequately investigate the claims and respond to the complaint.

9. Undersigned counsel has conferred with Plaintiff's counsel prior to the filing of this motion and Plaintiff's counsel has stated that he does not oppose an extension.

10. Undersigned counsel is cognizant that this matter was initiated on August 18, 2022, and the Court's instructions to move this case forward, as provided in the Paperless Order dated March 2, 2023. [DE 26]. Accordingly, undersigned counsel requests only a brief extension of three (3) days through Wednesday, March 8, 2023 to respond to the complaint.

Wherefore, Defendant respectfully requests this Honorable Court enter an Order granting a brief three (3) day extension of time through March 8, 2023 in which to file a response to Plaintiffs' Complaint.

Certificate of Conferral

Defendant's counsel conferred with Plaintiff's counsel prior to the filing of this motion. Plaintiff's counsel indicated he does not oppose this motion.

Dated: March 5, 2023

Respectfully Submitted,

Mamane Law LLC
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s/ Isaac Mamane
Isaac Mamane, Esq.
Florida Bar No. 44561

Certificate of Service

I hereby certify that a true and correct copy of Defendant's Unopposed Motion for Extension of Time was sent via CM/ECF to: Brian Pollock, Esq., Toussaint Cummings, Esq. FairLaw Firm, 135 San Lorenzo Avenue, Suite 770, Coral Gables, FL 33146, on this 5th day of March, 2023.

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s/ Isaac Mamane
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